

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

ROSS JAY LAWSON,

Plaintiff,

v.

Case No.: 00-6009
CIV-DIMITROULEAS
Magistrate Judge Sorrentino

KEN JENNE, WILLIAM HITCHCOCK,
BROWARD COUNTY DEPARTMENT
OF CORRECTIONS AND REHAB., ET AL,

**NIGHT BOX
FILED**

APR 19 2000

CLARENCE MADDOX
CLERK, USDC / SDFL / FTL

**DEFENDANTS', JENNE & HITCHCOCK,
ANSWER TO PLAINTIFF'S AMENDED COMPLAINT**

COME NOW the Defendants, KEN JENNE and WILLIAM HITCHCOCK, by
and through their undersigned counsel, and file this Answer to Plaintiff's Amended
Complaint, and would state:

JURISDICTION

1. Denied.
2. Denied.

DEFENDANTS

1. Denied.
2. Denied.
3. The identity of William Hitchcock is admitted. The remaining allegations
contained in Paragraph No. 3 are denied.

Lawson v. Jenne, et al
USDC Case No.: 00-6009

STATEMENT OF FACTS

1. Denied.

2. Denied.

3. Denied.

4. Denied.

5. Denied.

6. Denied.

7. Denied.

8. Denied.

9. Denied.

1. Denied.

2. Denied.

3. Denied.

4. Denied.

5. Denied.

6. Denied.

7. Denied.

8. Denied.

9. Denied.

Lawson v. Jenne, et al
USDC Case No.: 00-6009

10. Denied.
11. Denied.
12. Denied.

AFFIRMATIVE DEFENSES

1. The Amended Complaint fails to state a claim upon which relief can be granted against KEN JENNE in either his individual or his official capacity.
2. The Amended Complaint fails to state a claim upon which relief can be granted against WILLIAM HITCHCOCK in either his individual or his official capacity.
3. The Amended Complaint fails to allege that KEN JENNE and/or WILLIAM HITCHCOCK are not entitled to the defense of qualified immunity in the claims brought against them in their individual capacity.
4. The Amended Complaint fails to state a claim upon which relief can be granted as the acts alleged do not give rise to a federal claim and, alternatively, the allegations are not sufficiently specific to put the Defendants on notice of what actions the Plaintiff alleges are violative of federally protected rights.
5. The Amended Complaint fails to state a claim upon which relief can be granted as it fails to allege that the Plaintiff has exhausted his administrative remedies.

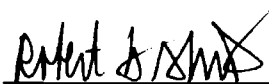
Lawson v. Jenne, et al
USDC Case No.: 00-6009

6. The Defendants reserve their right to amend and supplement these Affirmative Defenses as may appear to be appropriate upon further discovery being conducted in this case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. Mail this 19th day of April, 2000 to: **ROSS JAY LAWSON**, Pro Se Plaintiff, FL 97-9905, Post Office Box 9356, Fort Lauderdale, Florida 33310.

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